



PSNGP Information Session

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Water Quality Program

February 9th and 10th, 2021

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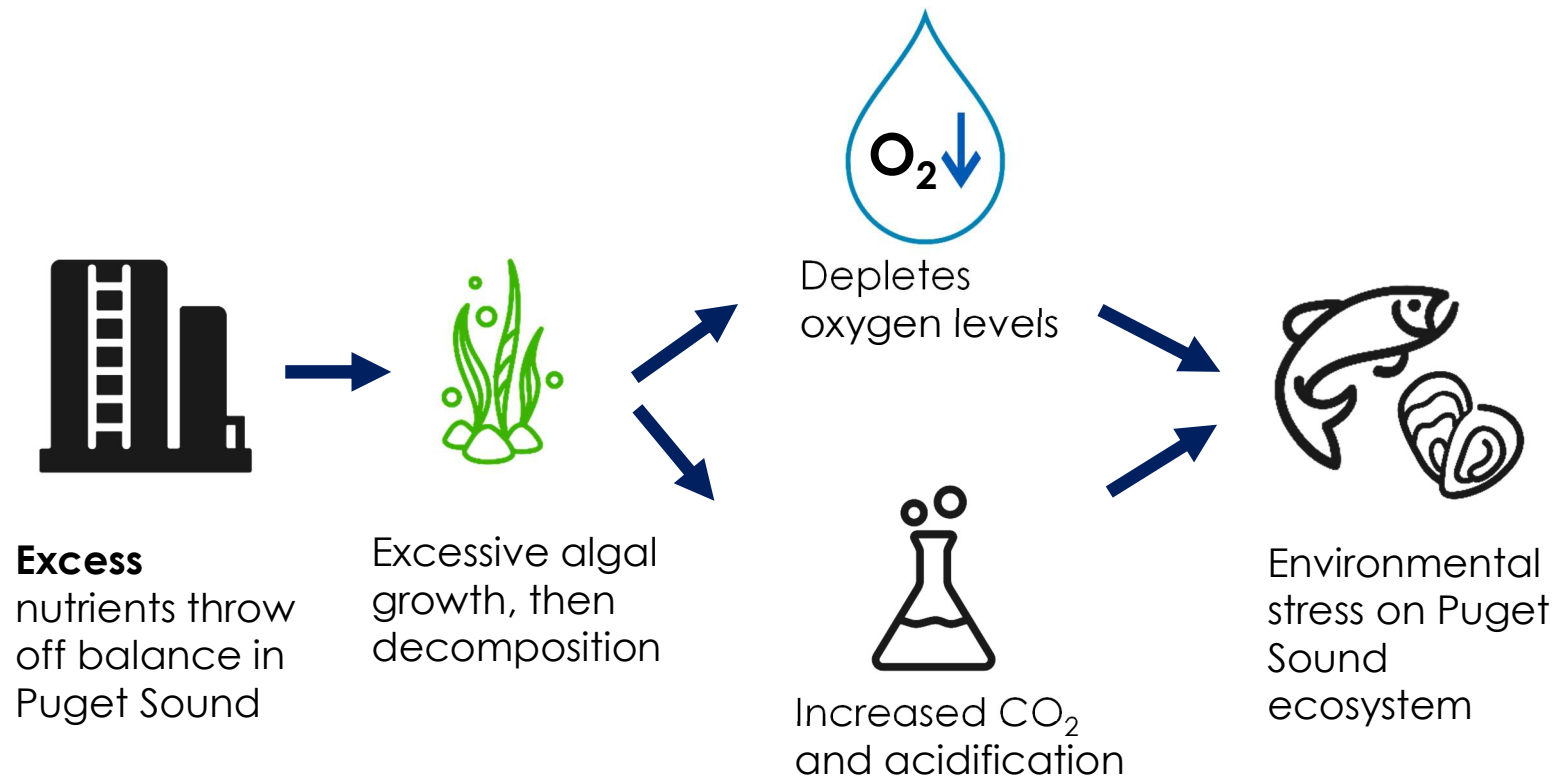
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Background

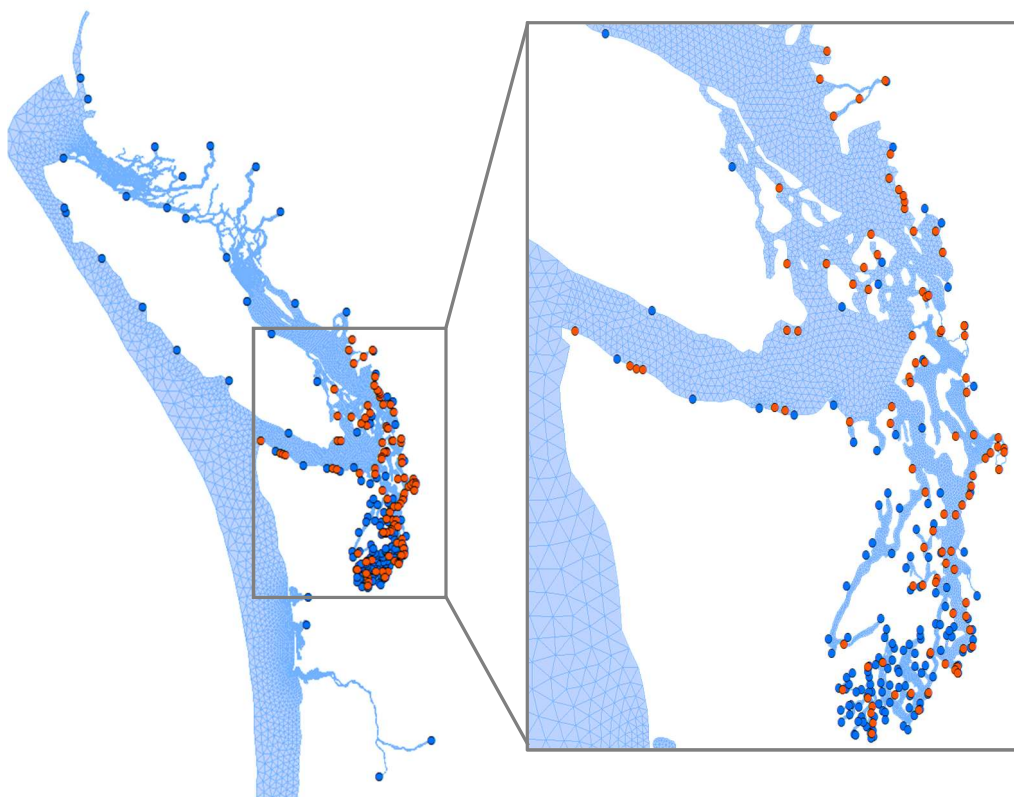
Why do we need point source controls?



Nutrient Imbalance Impacts Puget Sound

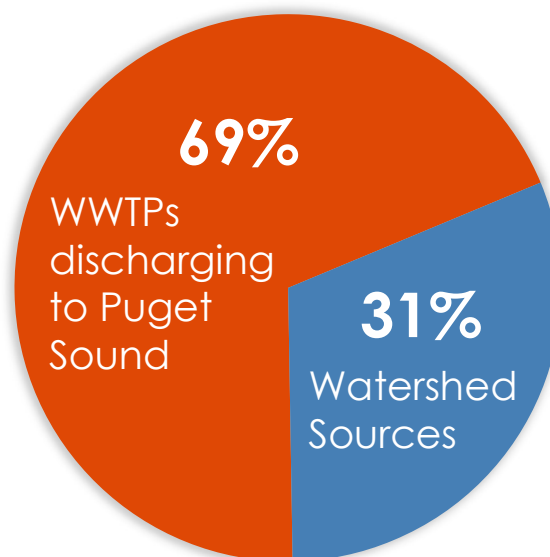


Human Nitrogen Sources



● **Point-Sources
(incl. WWTPs)**

● **Rivers
(Watersheds)**



January 2019 Bounding Scenarios Report
(Publication No. 19-03-001)

Advisory Committee

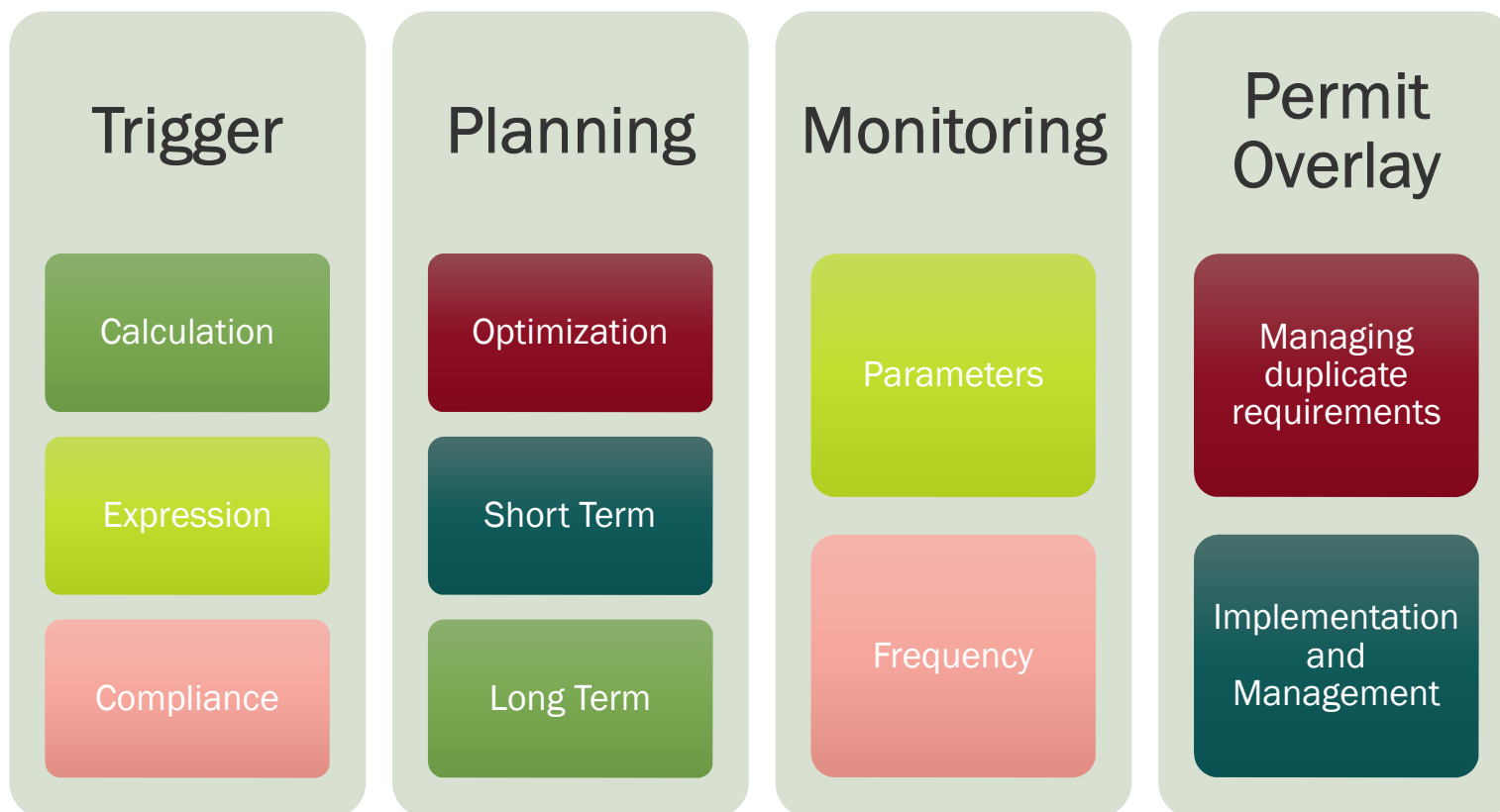
Overview and Recommendations



Advisory Committee (AC) Makeup

Name	Affiliation	Role	Geography
Mark Sadler	City of Everett, Public Works	Operations Superintendent	North Central
Joe Grogan	Town of Coupeville	Utility Superintendent	North Central
Dan Thompson	City of Tacoma	Division Manager	South Central
Rebecca Singer	King County DNRP, Wastewater Treatment Division	Resource Recovery Manager	South Central
Patrick Kongsli	Pierce County Planning and Public Works - Sewer Division/PNCWA Olympic Section	Sewer Division Maintenance and Operations Manager	South Central
Wendy Steffensen	LOTT Clean Water Alliance (wastewater utility)	Environmental Project Manager	South Sound
Pete Tjemsland	City of Sequim	Utilities Manager and Operator	Strait of Juan de Fuca
Jeff Clarke	Washington Association of Sewer & Water Districts	Former Executive Director	Puget Sound Wide
Bruce Wishart	Puget Soundkeeper	Policy Lead	Puget Sound Wide
Mindy Roberts	Washington Environmental Council	Puget Sound Program Director	Puget Sound Wide
Jenny Wu	EPA	Engineer, permit writer	Puget Sound Wide
Valerie Smith	Dept of Commerce	Senior Planner	Puget Sound Wide
Chip Anderson	Lummi Tribal Water and Sewer District	District Manger	North Sound
Tribe			
Eleanor Ott	Dept of Ecology	Permit Writer	Puget Sound Wide

Topics Discussed by the AC



PSNGP AC Summary

Agreements

- All plants must optimize
- Consistent data collection
- Conduct a regional nutrient reduction study

Disagreements

- Setting a target load to trigger additional actions
- How to accommodate growth
- Early planning using “bookends”

Proposed Permit Framework

Overview

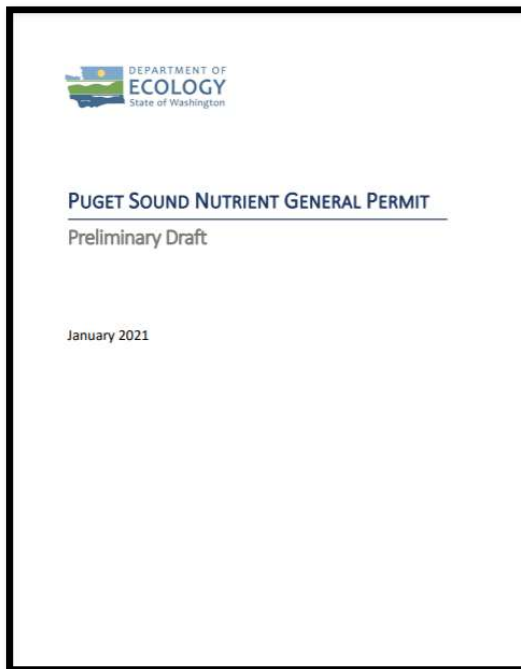


How will the PSNGP work?

- Applies to wastewater treatment plants discharging to Puget Sound
- Only focus on controlling nutrients
- In conjunction with individual permits
- Future versions will reflect modeling results



Intent for 1st Permit Term



- Shared foundation for future nutrient reductions
- Implements AC recommendations
- Iterative requirements (adaptive management)
- No large capital investment requirements

Coverage Basics

- Who is proposed for coverage?
- Who is excluded?
 - How will Ecology address reductions at these plants?
- Proposed coverage mechanics

Action Levels

- Numeric triggers for nutrient reduction requirements
 - Baseline, AL_0
 - Upper Threshold, AL_1
- How were they calculated?
- What if there's a lack of data?

TIN Action Level Comparison

AL_0 – Baseline, lbs/year

- 99% UCL from bootstrapping calculator, representative of existing loading
- Proposing to apply to all WWTPs (unless there's a TN/TIN WLA)
- <https://steve-hood.shinyapps.io/TINTrigger/>

AL_1 – Upper Threshold, lbs/year

- $AL_0 + 5\%$; or
- $10 \text{ mg/L} * 85\% \text{ MMDF} * 8.34 \text{ lbs/gal} * 365 \text{ days/year}$

Monitoring and Reporting

- Tiered requirements based on facility size
 - >10 MGD
 - 3-10 MGD
 - <3 MGD
- Frequencies may differ if a starting with absence of data
 - Mechanism for monitoring reduction requests

Treatment Optimization

- Forms the adaptive management component
- Utilizes a tiered response tied to action levels
 - Each tier requires more robust reduction actions
- Annual reporting requirement for all

Action Levels and Defined Response



Planning Requirements

- Nutrient Reduction Evaluation
 - Possible “bookending” evaluation looking at different treatment ranges
 - Opportunity for a regional study
- Additional planning requirements triggered by exceeding AL_1 : Tier 3
 - Must advance selection of nutrient removal technologies
 - Feedback wanted on proposed actions

Possible Funding Support

- \$9 million in Governor Inslee's budget
 - Planning
 - Optimization



- Implementation similar to Stormwater Capacity Grant

Commenting Basics

Preliminary draft

Comments due March 15, 2021



How to Comment on the Preliminary Draft

- Please use eComments link on webpage
- Focus on:
 - Areas of agreement
 - Areas of disagreement
 - Specific questions in document directed to reviewers



On-Line Comment Form

Public Comment Form

1 Comment

2 Review

3 Your Copy

Commenting open: **January 27, 2021 12:00AM PT - March 15, 2021 11:59PM PT.**

Puget Sound Nutrient General Permit Preliminary Draft Informal Comment Period

We are asking for comments on a preliminary draft of the Puget Sound Nutrient General Permit. This permit will establish nutrient reduction practices for wastewater treatment plants to prevent excess nutrients and protect waters of the state.

Please note that this comment form is for the purpose of submitting a comment to the Washington State Department of Ecology.

Commenter contact information is optional. However, contact information is necessary if you want to receive future notices related to this topic.

Contact Information

All fields are optional unless otherwise indicated.

Submitted By

Individual

First Name

Last Name

Address

City

State

Washington

ZIP

Email

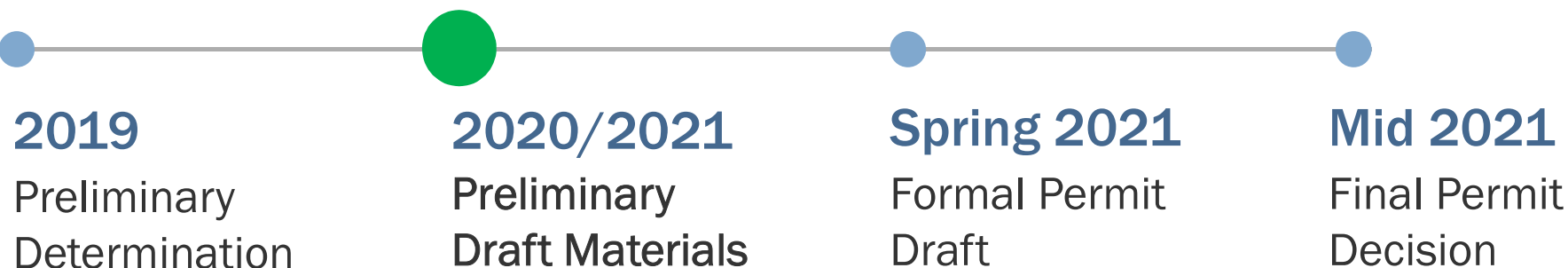
Your Comment

Comments are due by March 15, 2021, 11:59 pm

To make a comment, please enter comment(s) in the text area below. To submit attachments use the 'upload a file' button below. Then hit 'Continue' to review your comments(s). For tips and instructions on submitting comments visit: [How to submit comments to us](#).

<http://wq.ecology.commentinput.com/?id=aiK7u>

Nutrient General Permit Schedule





Thank You!

Subscribe to Puget Sound Nutrient
General Permit Listserv:

[http://listserv.ecology.wa.gov/scripts/wa-
ECOLOGY.exe?A0=NUTRIENTS-PERMIT](http://listserv.ecology.wa.gov/scripts/wa-ECOLOGY.exe?A0=NUTRIENTS-PERMIT)

Questions?

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360-280-5624

Link to eComments

<http://wq.ecology.commentinput.com/?id=aiK7u>

Web page

<https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Nutrient-Permit>

Nutrient Listserv

<http://listserv.ecology.wa.gov/scripts/wa-ECOLOGY.exe?A0=NUTRIENTS-PERMIT>



DEPARTMENT OF
ECOLOGY
State of Washington